

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address  Aram Ordubegian (SBN 185142) M. Douglas Flahaut (SBN 245558) Annie Y. Stoops (SBN 286325) <b>ARENT FOX LLP</b> 555 West Fifth Street, 48th Floor Los Angeles, CA 90013-1065 Telephone: 213.629.7400 Facsimile: 213.629.7401 Email: <a href="mailto:aram.ordubegian@arentfox.com">aram.ordubegian@arentfox.com</a> <a href="mailto:douglas.flahaut@arentfox.com">douglas.flahaut@arentfox.com</a> <a href="mailto:annie.stoops@arentfox.com">annie.stoops@arentfox.com</a>  <input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> General Bankruptcy and Restructuring Counsel for Debtors and Debtors-in-Possession	FOR COURT USE ONLY
<b>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION</b>	
In re:  <b>COLDWATER DEVELOPMENT LLC</b> , a California limited liability company, <div style="text-align: right;">Debtor and Debtor-in-Possession.</div> <hr style="border-top: 1px dashed black;"/> In re:  <b>LYDDA LUD, LLC</b> , a California limited liability company, <div style="text-align: right;">Debtor and Debtor-in-Possession.</div> <hr/> [x] Affects both Debtors. [ ] Affects Coldwater Development LLC only. [ ] Affects Lydda Lud, LLC only  <div style="text-align: right;">Debtors and Debtors-in-Possession.</div>	LEAD CASE NO.: 2:21-bk-10335-BB  CHAPTER: 11  JOINTLY ADMINISTERED WITH CASE NO.: 2:21-bk-10336-BB   <div style="text-align: center; padding: 20px;"> <b>SECOND AMENDED NOTICE OF SALE OF ESTATE PROPERTY</b> </div>

<b>Sale Hearing Date:</b> October 27, 2021	<b>Time:</b> 11:00 a.m. PPT
<b>Location:</b> Courtroom 1539, U.S. Bankruptcy Court, 255 East Temple Street, Los Angeles, CA 90012 <sup>1</sup>	

**Type of Sale:**   ☒ Public   ☐ Private                      **Last date to file objections:** October 13, 2021

**Description of property to be sold:** Coldwater Development LLC's two lots, identified by the Assessor's Parcel Numbers: 4387-021-018 and 4387-021-019 (the "Coldwater Lots"), and Lydda Lud, LLC's four lots, identified by the Assessor's Parcel Numbers: 4387-022-001, 4387-022-002, 4387-020-001, and 4387-020-009 (the "Lydda Lots") (collectively, the "Debtors' Six Lots").

<sup>1</sup> Information on how to make a court appearance can be found at the Court's website: <https://www.cacb.uscourts.gov/judges/honorable-sheri-bluebond>.

**Terms and conditions of sale:** Free and clear of liens, claims, interests, and encumbrances, pursuant to Bankruptcy Code § 363(f), subject to higher and better offers.

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**Proposed sale price:** Please contact the Debtors' broker Rodrigo Iglesias, Email: [rodrigo@hiltonhyland.com](mailto:rodrigo@hiltonhyland.com) and Telephone: (310) 699-3435.

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**Overbid procedure (if any):** See the Final Bidding Procedures attached to the Court's Order Approving Bidding Procedures [Dkt. No. 146].

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**If property is to be sold free and clear of liens or other interests, list date, time and location of hearing:**

The Debtors' Six Lots are to be sold free and clear of liens or other interests. Qualified bidders may bid at the auction\* on:

Date: October 27, 2021

Time: 11:00 a.m. Pacific Prevailing Time

Location: U.S. Bankruptcy Court, Courtroom 1539<sup>2</sup>

255 East Temple Street, Los Angeles, CA 90012

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\*A hearing to approve the proposed sale of the Debtors' Six Lots shall follow the auction to approve the sale to the Successful Bidder on October 27, 2021 at 11:00 a.m. PPT at the United States Bankruptcy Court, Central District of California, Los Angeles Division at Courtroom 1539, 255 East Temple Street, Los Angeles, CA 90012.

**Contact person for potential bidders (include name, address, telephone, fax and/or email address):**

Aram Ordubegian and Annie Y. Stoops

Arent Fox LLP

555 West 5<sup>th</sup> Street, 48<sup>th</sup> Floor

Los Angeles, CA 90013

Telephone: (213) 629-7400

Fax: (213) 629-7401

Email: [aram.ordubegian@arentfox.com](mailto:aram.ordubegian@arentfox.com); [annie.stoops@arentfox.com](mailto:annie.stoops@arentfox.com)

**Date:** October 6, 2021

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<sup>2</sup> Information on how to make a court appearance can be found at the Court's website: <https://www.cacb.uscourts.gov/judges/honorable-sheri-bluebond>.

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

Arent Fox LLP, Gas Company Tower, 555 West Fifth Street, 48th Floor, Los Angeles, CA 90013.

A true and correct copy of the foregoing document entitled (*specify*): **SECOND AMENDED NOTICE OF SALE OF ESTATE PROPERTY** will be served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) **10/06/2021**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:** On (date) **10/06/2021**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

10/06/2021  
Date

YVONNE LI  
Printed Name

/s/ Yvonne Li  
Signature

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

Eryk R Escobar on behalf of U.S. Trustee United States Trustee (LA)  
eryk.r.escobar@usdoj.gov

M Douglas Flahaut on behalf of Debtor Coldwater Development LLC  
flahaut.douglas@arentfox.com

M Douglas Flahaut on behalf of Debtor Lydda Lud, LLC  
flahaut.douglas@arentfox.com

Eric J Fromme on behalf of Interested Party Courtesy NEF  
efromme@tocounsel.com, stena@tocounsel.com

Asa S Hami on behalf of Interested Party Courtesy NEF  
ahami@sulmeyerlaw.com,  
pdillamar@sulmeyerlaw.com;pdillamar@ecf.inforuptcy.com;cblair@sulmeyerlaw.com;ahami@ecf.inforuptcy.com

Christopher J Harney on behalf of Interested Party Courtesy NEF  
charney@tocounsel.com, stena@tocounsel.com

Daniel A Lev on behalf of Creditor Give Back LLC  
dlev@sulmeyerlaw.com, ccaldwell@sulmeyerlaw.com;dlev@ecf.inforuptcy.com

Daniel A Lev on behalf of Interested Party Courtesy NEF  
dlev@sulmeyerlaw.com, ccaldwell@sulmeyerlaw.com;dlev@ecf.inforuptcy.com

Aram Ordubegian on behalf of Debtor Coldwater Development LLC  
ordubegian.aram@arentfox.com

Aram Ordubegian on behalf of Debtor Lydda Lud, LLC  
ordubegian.aram@arentfox.com

Ronald N Richards on behalf of Creditor Give Back LLC  
ron@ronaldrichards.com, morani@ronaldrichards.com

Ronald N Richards on behalf of Interested Party Courtesy NEF  
ron@ronaldrichards.com, morani@ronaldrichards.com

Annie Y Stoops on behalf of Debtor Coldwater Development LLC  
annie.stoops@arentfox.com, yvonne.li@arentfox.com

Annie Y Stoops on behalf of Debtor Lydda Lud, LLC  
annie.stoops@arentfox.com, yvonne.li@arentfox.com

United States Trustee (LA)  
ustpreion16.la.ecf@usdoj.gov

Dylan J Yamamoto on behalf of Debtor Coldwater Development LLC  
dylan.yamamoto@arentfox.com

**2. SERVED BY UNITED STATES MAIL:**

**SECURED CREDITORS**

Give Back LLC  
P.O. Box 11480  
Beverly Hills, CA 90213

Shahbaz Law Group  
15760 Ventura Blvd., Ste. 850  
Encino, CA 91436

Los Angeles County Tax Collector  
P.O. Box 54110  
Los Angeles, CA 90054-0110

**CREDITORS MATRIX**

Bel Air Project LLC  
9454 Wilshire Blvd. #320  
Beverly Hills, CA 90212

Law Offices of Adulaziz, Grossbart  
and Rudman  
6454 Coldwater Canyon Ave.  
North Hollywood, CA 91606

RAL Design and Management Inc.  
Russell Linch  
25031 W. Avenue Stanford Unit  
100  
Valencia, CA 91355

Construction Enterprise & Services  
11301 W. Olympic Blvd. #537  
Los Angeles, CA 90064

LC Engineering Group, Inc.  
889 Pierce Court, Suite 101  
Thousand Oaks, CA 91360

State of California Department of  
Industrial Relations  
6150 Van Nuys Blvd # 105  
Van Nuys, CA 91401

First Credit Bank  
9255 Sunset Blvd.  
West Hollywood, CA 90069

Lincoln Resorts an AZ Joint  
Venture  
c/o Freeman Freeman & Smiley  
LLP  
1888 Century Park East St. 1500  
Los Angeles, CA 90067

Tree Lane LLC  
11301 W. Olympic Blvd. #537  
Los Angeles, CA 90064

Internal Revenue Services  
P.O. Box 7346  
Philadelphia, PA 19101-7346

Land Phases Inc.  
5158 Cochran St.  
Simi Valley, CA 93063

Los Angeles Department of Water  
and Power  
P.O. Box 51111  
Los Angeles, CA 90051

Treetop Development LLC  
11301 W. Olympic Blvd. #537  
Los Angeles, CA 90064

Larry A. Rothstein  
2945 Townsgate Rd., Suite 200  
Westlake Village, CA 91361

Permits Unlimited  
4340 Caleta Rd.  
Agoura Hills, CA 91301

**OTHER LIEN HOLDERS**

The Claims Center, LLC  
3300 Fernbrook Lane North Suite  
180  
Plymouth, MN 55447

The Claims Center, LLC  
c/o Homan Mobasser  
18375 Ventura Blvd # 342  
Tarzana, CA 91356-4218

Franchise Tax Board Bankruptcy  
Section, MS: A-340  
P. O. Box 2952  
Sacramento, CA 95812-2952

The Claims Center, LLC  
c/o C T Corporation System  
330 N. Brand Blvd Ste 700  
Glendale, CA 91203

Ellen Scott  
5318 Bellingham Ave  
Valley Village, CA 91607-2604

Internal Revenue Service  
P.O. Box 7346  
Philadelphia, PA 19101-7346

The Claims Center, LLC  
c/o Prober & Raphael, A Law  
Corporation  
20750 Ventura Blvd, Suite 100  
Woodland Hills CA 91364

Friends of The Hastain Trail  
and Ellen Scott  
c/o Stephen L. Jones, Counsel in  
State Court Action No. BC469573  
Overton Lyman & Prince, LLP  
520 South Grand Avenue,  
Suite 395  
Los Angeles, CA 90071

Shahbaz Law Group  
15760 Ventura Blvd., Ste. 850  
Encino, CA 91436